

EXHIBIT 01

Ammerson v. FMC

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

CINDY COSPER, INDIVIDUALLY)	
AS SURVIVING CHILD OF)	
RONNIE AMMERSON,)	
)	
Plaintiff,)	CIVIL ACTION FILE
Vs.)	NO. 2:18-cv-00189-RWS
)	
FORD MOTOR COMPANY,)	
)	
Defendant.)	

PLAINTIFF’S SUPPLEMENTAL INITIAL DISCLSoure

COMES NOW Plaintiff Cindy Cospers (“Plaintiff”), by and through her undersigned counsel, and herein serves her supplemental initial disclosures, (maintaining her objection to the untimely removal of this Action), as follows:

(3) Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subject of the information.

RESPONSE:

See Attachment A.

SUPPLEMENTAL RESPONSE:

Please see additional names of employees, past and present, who worked on development of the Explorer and have been deposed. Plaintiff reserves the right to use those depositions and the exhibits to those depositions.

WITNESS	DATE
Abreu, Luis	06.07 - 08.01
Arndt, Mark	12.14.00
Arndt, Mark	06.12.02
Arndt, Mark	03.31.06
Arndt, Steve	12.15.00
Arndt, Steve	06.12.02

Ault, William	11.30.01
Baccouche, Mohammed	05.12.06
Bacigalupi, Robert	11.21.96
Balavich, Karen	05.11.06
Baldwin, John	09.14.05
Baldwin, John	10.04.07
Baldwin, John	10.30.07
Baldwin, John	08.26.08
Ball, Ken	07.10.01
Ballard, William	05.29.08
Ballard, William	11.02.07
Bauch, David	05.25.06
Baughman, Thomas	12.21.00
Beckwith, Gene	07.24.02
Behr, John	06.21-22.01
Behr, John	08.20-21.01
Bernstorf, Carolyn	07.16.03
Bliznick, Thomas	07.29.08
Boehly, William	07.11.01
Bohm, Georg	09.06-07.01
Bradley, Joseph	05.25.06
Brown, Patricia	04.30.04
Burdette, James	12.21.00
Cabellero, Edivia	07.11 - 12.01
Campbell, Ron	05.12.99
Candido, Dennis	06.26.02
Candido, Dennis	05.22.01
Chamberlin, James	05.27.08
Cheng, James	07.09.03
Claudepierre, Dale	08.27-28.01
Cowley, Mike	07.19.00
Craig, Daniel	07.09.03
Cullen, Jaime	03.09.00
Cunningham, Clarke	07.20.00
DaSilva, Antonio	07.09 - 10.01
Davis, Tim	07.19-20.01
Duvall, Rick	06.04.01
Duvall, Rick	10.15.01
Eagelson, William	07.09.03
Figliomeni, Francis	11.12.01
Fredriksson, Andres	06.07.06
Freund, William	01.23.02
Fukushima, Ryotaro	02.20-21.02
Gardner, James	12.13.00
Gardner, James	01.03.01

Gonzalez, Jorge	06.05 - 06.01
Govindjee, Sanjay	04.17.01/05.23-24.01
Grush, Ernie	10.17.00
Halverson, Bruce	07.31.01
Handlos, Robert	07.24.02
Hara, Hideo	07.24 - 25.01
Hara, Hideo	10.16.01
Harding, Lindsey	07.10.03
Heinrich, Edgard	07.10-12.02
Hoetzel, John	01.24.02
Houston, Dave	06.09.99
Howe, Terry	11.19.02
Humbert, Barry	01.08.02
Ishibashi, Shuichi	10.18.01
Jakobsson, Lotta	06.08.06
Janitor, William	09.14.05
Janssen, Marvin	10.05.01
Johnson, James	10.08-09.01
Jones, Ian	
Judge, Karen	04.19.00
Kaizaki, Yoichiro	03.07-08.02
Kang, Hongbin	05.25.06
Kapadia, Max	04.19.00
Katsura, Shingo	02.12-13.02
Killgoar, Paul	05.12.06
Klein, Lisa	05.30 - 31.01
Kocaj, Virgina	06.20.01
Krishnaswami, Ram	07.31.08
Krivstov, Vasiliy	07.29.08
Kuznicki, Joseph	04.24.02
Lampe, John	07.05 - 06.01
Lanzoratta, Joseph	11.15.01
Laubie, Dave	05.10.01
Lewicki, Norm	05.23.02
Li, Jessy	07.09.03
Little, John	07.23.96
Marble, Roger	05.21.01
Maron, Carlos	08.13-14.01
Martin, Robert	11.27.00
Mast, Tom	06.08.99
Mazzorin, Carlos	06.25 - 27.01
McCoy, Robert	05.11.06
McGill, Harold	01.10.02
McMillan, Harry	06.05.01
Metters, Jerry	08.10.01

Morgans, Shawn	07.30.08
Nasser, Jacques	08.22-23.01
Nelson, Don	01.30.03
Niles, Thomas	07.30.08
Nilsson, Richard	06.07.06
Nozawa, Akira	02.05-06.01
Ohashi, Masayuki	02.14-15.02
Ono	10.09.00
Parekh, Deepak	11.05-07.01
Parma, Daryl	06.28.01
Pascarella, Bob	11.01.07
Pascarella, Bob	05.23.02
Pascarella, Bob	05.05.06
Pawling, Robert	07.09.01
Pearl, Ken	
Petrinic, John	07.16.03
Pett, Bob	06.28-29.01
Prasad, Priya	05.12.06
Queisar, Brian	05.09.01
Queisar, Brian	12.20.00
Rasor, Gregory	01.25.02
Rauner, Allan	05.16-17.01
Reep, Micheal	12.13.00
Reichenbach, Richard	07.27.01
Reichenbach, Richard	08.20-21.01
Riedinger, Timothy	07.16.03
Roberts, Dave	07.20.00
Roberts, Mark	03.08.00
Rodriguez, Hector	08.15 - 17.01
Rosebrook, Michael	07.30.08
Roundtree, Joseph	08.23.00
Saurer, Dan	08.14-15.01
Schonfeld, Steven	01.03.02
Seilnacht, Charles	01.29 - 30.02
Shelton, John	04.19.00
Shelton, Steve	01.30.03
Shih, Wei-Zin	04.19.00
Siegel, James	07.22.96
Simpson, Roger	06.09.99
Simpson, Roger	11.13.00
Sleath, Hank	03.08.00
Smith, William	03.18.98
Snodgrass, Ken	06.08.99
Spencer, Elizabeth	07.30.08
Stalnaker, Dave	01.23.03

Starr, Dave	05.12.99
Stevens, Greg	07.10.03
Sullivan, Kaye	03.09.06
Svanberg, Bo	06.08.06
Takasawa, Keith	07.20.00
Tanaka, Kenischi	02.19-20.02
Tandy, Don	03.03.00
Tandy, Don	12.23.02
Tandy, Don	08.26.08
Tandy, Ken	05.23.02
Togashi, Isao	1.30 - 31.02
Tomiyasu, Yuji	02.07 - 08.02
Van Noyen, Geert	09.06.05
Vandecaveye, Andrew	09.13.05
Vandewater, William	05.17.01
Veres, Bob	05.23.02
Versace, John	07.22.96
Wagner, David	05.12.06
Watanbe, Shigeo	03.05-06.02/03.12.02
White, Charles	11.14.00
Whitehead, Judith	07.20.00
Wotton, Dave	04.20.00
Wyant, Robert	07.26.01
Wyzgoski, James	10.03.01
Yoshida, Yoshio	03.11.02
Yurjevich, Martin	09.04.01

This 26th day of September 2021.

Respectfully submitted,
/s/Matthew E. Cook
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